

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SPECTRUM DYNAMICS MEDICAL
LIMITED,

Plaintiff,

v.

GENERAL ELECTRIC COMPANY, GE
HEALTHCARE, INC., GE MEDICAL
SYSTEMS ISRAEL LTD., JEAN-PAUL
BOUHNIK, SERGIO STEINFELD, ARIE
ESCHO, NATHAN HERMONY, and YARON
HEFETZ,

Defendants.

Case No.: 18-cv-11386 (VSB)

**DECLARATION OF P. BRANKO
PEJIC IN SUPPORT OF PLAINTIFF
SPECTRUM DYNAMICS MEDICAL
LIMITED'S MOTION REGARDING
LEGAL CONSULTANTS' ACCESS
TO HIGHLY CONFIDENTIAL
INFORMATION UNDER THE
STIPULATED CONFIDENTIALITY
AND PROTECTIVE ORDER
ENTERED DECEMBER 14, 2020
[D.I. 156]**

P. Branko Pejic, an attorney admitted pro hac vice in the Southern District of New York for purposes of this litigation, hereby declares the following under penalty of perjury:

1. I am a member of the bars of the District of Columbia and Arkansas. I was admitted pro hac vice before the Southern District of New York on December 20, 2018 [D.I. 8]. I am a lawyer at the law firm of Greenblum & Bernstein, P.L.C, attorneys for Plaintiff Spectrum Dynamics Medical Limited ("Plaintiff") in the above-captioned action. I submit this declaration in support of Plaintiff's Motion Regarding Legal Consultants' Access To Highly Confidential Information Under The Stipulated Confidentiality And Protective Order Entered December 14, 2020 [D.I. 156].

2. A true and correct copy of Mr. Cabanel's profile, as downloaded from (<https://www.cabanel-law.com/founder.html>) and printed on December 17, 2020, is attached hereto as **Exhibit 1**.

3. A true and correct copy of Mr. Bareket's profile, as downloaded from (<https://gilat-bareket.rcip.co.il/en/team/eran-bareket>) and printed on December 18, 2020, is attached hereto as **Exhibit 2**.

4. A true and correct copy of Defendants General Electric Company, GE Healthcare, Inc., GE Medical Systems Israel Ltd., Jean-Paul Bouhnik, Sergio Steinfeld, Arie Escho, And Nathan Hermony's Initial Disclosures Pursuant To Federal Rule Of Civil Procedure 26(a)(1) dated September 3, 2020 is attached hereto as **Exhibit 3**.

5. A true and correct copy of an email dated September 23, 2020 from Defendants' counsel to Plaintiff's counsel is attached hereto as **Exhibit 4**.

6. A true and correct copy of an email dated October 12, 2020 from Defendants' counsel to Plaintiff's counsel is attached hereto as **Exhibit 5**.

7. A true and correct copy of selected pages (pages 12-15) of Transcript of Telephonic Discovery Conference conducted December 8, 2020 is attached hereto as **Exhibit 6**.

8. A true and correct copy of Judgment in *Molecular Dynamics Limited et al. v. Spectrum Dynamics Medical Limited* before the Eastern Caribbean Supreme Court of the British Virgin Islands, Claim No. BVIHCM 2019/0113, available at <https://www.eccourts.org/molecular-dynamics-limited-et-al-v-spectrum-dynamics-medical-limited/>, as downloaded and printed on December 18, 2020, is attached hereto as **Exhibit 7**.

9. A true and correct copy of an email dated January 9, 2019 from Defendants' counsel to Plaintiff's counsel is attached hereto as **Exhibit 8**.

Dated: Reston, Virginia
December 18, 2020

By: /s/ P. Branko Pejic
P. Branko Pejic

GREENBLUM & BERNSTEIN, P.L.C.
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